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A CORRECTION.

Owing to an error a clause was omitted in the note appended to Mr. Morse's article on "The Civil and Political Status of the Inhabitants of Ceded Territories" which appeared in the December number of the HARVARD LAW REVIEW. The sentence beginning on line 15 of the note embodying Mr. Kennedy's comment on Mr. Morse's article (p. 272) should read as follows: "They had over 7000 Spanish prisoners whom they had captured with the towns and forts on the coast as well as in the interior," etc.

PROOF OF CONTINGENT CLAIMS IN BANKRUPTCY. — A late referee's decision draws attention to a noticeable omission in the United States Bankruptcy Law of 1898. The bankrupts had guaranteed the payment of certain notes at their maturity, which did not occur until a short time after the beginning of the bankruptcy proceedings. The holder of the notes sought to prove against the estate, but the claim was dismissed on the ground that the bankrupts had been under no "fixed liability absolutely owing at the time of the filing of the petition," within section 63 a (1) of the present act. *In the matter of J. R. McCauley & Sons*, 2 N. B. N. Rep. 1085. The result reached was necessary, as the present law fails to provide in any way for the proof of contingent debts, except in the case of a surety of the bankrupt proving in the creditor's name (sec. 57 i.).

This exclusion of contingent claims from proof is a return to the rule of the older English and American statutes, which provided only for liquidated debts absolutely owing at the time of the bankruptcy. However,